From: <u>Jay Field</u>

To: <u>Chip Humphrey/R10/USEPA/US@EPA</u>

Cc: Burt Shephard/R10/USEPA/US@EPA; Joe Goulet/R10/USEPA/US@EPA; Jennifer Peterson; ANDERSON Jim M;

POULSEN Mike; Robert Neely; Jeremy Buck@fws.gov

Subject: Re: Fw: LWG Response to EPA September 27, 2010, December 8, 2010 and December 21, 2010 Letters

**Date:** 01/14/2011 08:22 AM

Chip, just to set the record straight on a couple of issues:

#2. "As you know, an error was discovered in the new LRM on December 15." This is not accurate. An error in the positive likelihood calculation for some individual models was discovered. because that statistic was used in selection of individual models, I went through the model selection procedure again. There was nothing inherently wrong with the original LRM, but I wanted to be as consistent as possible with the procedure for selecting the individual models that I outlined in the description of methods. This further illustrates that there is no "correct model" (applies to both the FPM and LRM), but models that have different statistical performance or may rely on different sets of indicators to predict toxicity.

4. "EPA acknowledged that the Level 2 benthic toxicity predictions for the Hyalella biomass endpoint are unreliable..." I'll defer to Burt and others on this one, but my recollection is that Eric said that the the Hyalella biomass endpoint may be less reliable or have greater uncertainty, but still should be used. If EPA thought this endpoint was unreliable, why would EPA support the use of the LRM, which includes the Hyalella biomass endpoint as a major component of the model derivation and calibration?

also, we still have not received a table (xls or  $\mbox{mdb})$  with the selected floating point  $\mbox{models}.$ 

Thanks,

On 1/12/2011 5:06 PM, Humphrey.Chip@epamail.epa.gov wrote:

> Here the LWG's response letter

> ---- Forwarded by Chip Humphrey/R10/USEPA/US on 01/12/2011 04:34 PM

> ---
> LWG Response to EPA September 27, 2010, December 8, 2010 and December 21, 2010 Letters

> Jennifer Woronets

> Chip Humphrey

01/12/20

11 04:23

PM

> Cc:

jim.mckenna, "Jennifer Woronets", "Keith Pine", "Carl Stivers", "Betz, Jan", "Bob Wyatt", david.ashton, Frederick.wolf, frederickwolf, "Jennifer Woronets", jim.mckenna, karen.traeger, "Madalinski, Kelly", pdost, Rick.Applegate, "Steve Parkinson", aebbets, ANDERSON.Jim, audiehuber, "Bob Wyatt", "Colin Wagoner ", cunninghame, erin.madden, Chip Humphrey, "JD Williams ", "Jennifer Peers", "Jennifer Woronets", jim.mckenna, "Julie Weis", "Keith Pine", Kristine Koch, lisa.bluelake, "Madalinski, Kelly", matt, "MCCLINCY Matt", "Michael Karnosh", Rick.Applegate, "Robert Neely", "Rose Longoria", tzeilman

> Chip,

> Per our conversation this afternoon during the Portland Harbor Managers > meeting, attached please find the LWG response to EPA's September 27, > 2010 letter on the benthic risk evaluation, December 8, 2010 letter on > the general responses to EPA non-directed RI, BHRRA and BERA comments > and December 21, 2010 EPA letter on the status of the Portland Harbor > Feasibility Study. Our response letter includes acceptance of your > invitation to meet and discuss the overall project process.

> Please let us know if you have any questions.

> Thank you, > Jen Woronets J